

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.

Defendant.

Civil Action No.: 6:20-cv-00812-ADA
6:20-cv-00813-ADA
6:20-cv-00814-ADA
6:20-cv-00815-ADA
6:20-cv-00816-ADA
6:20-cv-00902-ADA
6:20-cv-00903-ADA

JURY TRIAL DEMANDED

**DECLARATION OF TODD BRIGGS IN SUPPORT OF JUNIPER NETWORKS, INC.'S
OPPOSED MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA**

I, Todd Briggs, declare and state as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP, counsel for Defendant Juniper Networks, Inc. (“Juniper”). I have personal knowledge of the matters stated herein and, if called as a witness, could and would testify competently to such facts under oath.

2. Attached hereto as Exhibit A is a true and correct copy of Brazos’s website’s landing page, available at <https://www.brazoslicensing.com> and accessed on November 19, 2020.

3. Attached hereto as Exhibit B is a true and correct copy of Patent Assignment Agreement number 504735538, dated January 18, 2018, by which Alcatel Lucent assigned certain patents to Brazos.

4. Attached hereto as Exhibit C is a true and correct copy of Brazos’s website’s “About” page, available at <https://www.brazoslicensing.com/about> and accessed on November 19, 2020.

5. Attached hereto as Exhibit D is a true and correct copy of a LinkedIn profile for Craig Etchogoyen, available at www.linkedin.com/in/craig-etchegoyen-aa8a07199 and accessed on November 19, 2020.

6. Attached hereto as Exhibit E is a true and correct copy of a LinkedIn profile for Craig Etchogoyen, available at www.linkedin.com/in/craig-etchegoyen-72244a13 and accessed on November 19, 2020.

7. Attached hereto as Exhibit F is a true and correct copy of a LinkedIn profile for Aaron Garvey, available at www.linkedin.com/in/aaron-garvey-625681a4 and accessed on November 19, 2020.

8. Attached hereto as Exhibit G is a true and correct copy of a LinkedIn profile for Stuart Shanus, available at www.linkedin.com/in/stuart-a-s-60a7695 and accessed on November 19, 2020.

9. Attached hereto as Exhibit H is a true and correct copy of a LinkedIn profile for Matthew Hogan, available at www.linkedin.com/in/matthewhogan-76155b23 and accessed on November 19, 2020.

10. Juniper has identified several prior art witnesses in the Northern District of California. These witnesses include Cisco Systems, Inc., which has done considerable work in the spanning tree area purportedly covered by U.S. Patent No. 8,953,499 (“the ‘499 Patent”) and which is headquartered in San Jose. Hewlett-Packard, headquartered in Palo Alto, California, is also a prior art witness with respect to the ‘499 Patent. Futurewei Technologies, Inc., a Huawei subsidiary located in Santa Clara, California, is a prior art witness as to U.S. Patent No. 7,483,998 (“the ‘998 Patent”). Other prior art witnesses with respect to the ‘998 Patent include Newisys, Inc. (headquartered in San Jose) and IBM (headquartered in New York but with a large campus in San

Jose). LinkedIn Corporation, founded in Mountain View, California and with its headquarters in Sunnyvale, California, is a prior art witness as to U.S. Patent No. 7,620,273 (“the ‘273 Patent”).

I declare under penalty of perjury that the foregoing is true and correct.

Executed: November 25, 2020

A handwritten signature in black ink, appearing to read "Todd Briggs", is written over a horizontal line.

Todd Briggs